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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION TRUST
FOR SOUTHERN NEVADA; TRUSTEES OF
THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 HEALTH
BENEFITS FUND; TRUSTEES OF THE
BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

vs.

COMMERCIAL UNION TILE & STONE, INC.,
a Nevada corporation; VEGAS AFFORDABLE
STONE AND TILE, INC., a Nevada corporation;
STONE CONSULTING, LLC, a Nevada limited
liability company; JONATHAN WILLIAM
CANJA, individually; and JEDEDIAH
MICHAEL FELLER, individually,

Defendants.

CASE NO.: 2:15-cv-02129-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSES
TO PENDING MOTIONS FOR
SUMMARY JUDGMENT AS BETWEEN
PLAINTIFFS AND DEFENDANTS
VEGAS AFFORDABLE STONE AND
TILE, INC., STONE CONSULTING, LLC,
AND JEDEDIAH MICHAEL FELLER**

(FOURTH REQUEST)

1 Plaintiffs, by and through their undersigned counsel, and Defendants Vegas Affordable
2 Stone and Tile, Inc., Stone Consulting, LLC, and Jedediah Michael Feller (collectively,
3 “Stipulating Defendants”), by and through their undersigned counsel, stipulate and agree to
4 further extend the deadline to file responses to the following pending motions for summary
5 judgment from March 13, 2017 to April 13, 2017:

6 Defendant Jedediah Feller’s Motion for Summary Judgment (dkt. # 53);

7 Plaintiffs’ Motion for Summary Judgment as against Stipulating Defendants only (dkt. #
8 54);

9 Defendant Vegas Affordable Stone and Tile, Inc.’s Motion for Summary Judgment (dkt.
10 # 55);

11 Defendant Stone Consulting, LLC’s Motion for Summary Judgment (dkt. # 56);

12 This is the fourth request for an extension of time for these deadlines, and the request is
13 not made for the purpose of delay. As stated in the previous request, the parties to this stipulation
14 have reached a settlement. They are in the process of finalizing the written settlement agreement
15 and are merely discussing final revisions to the document. In the meantime, Stipulating
16 Defendants’ counsel has been delayed in reviewing the latest round of revisions from Plaintiff’s
17 counsel due to heavy activity in a wage/hour class/collective action pending in this District that
18 Stipulating Defendants’ counsel recently was retained on.

19 The parties to this stipulation submit that good cause appears for the extension, and they
20 continue to wish to dedicate time and resources to the resolution without incurring additional
21 litigation expense. The parties and their counsel will continue to work toward finalizing and
22 executing the settlement agreement prior to the deadline requested in this stipulation

23 The remaining defendants, Commercial Union Tile & Stone, Inc. and Jonathan William
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Canja, are not parties to the aforementioned settlement or to this stipulation.

Dated this 10th day of March, 2017.

GARG GOLDEN LAW FIRM

THE URBAN LAW FIRM

By /s/ Anthony B. Golden
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By /s/ Nathan R. Ring
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Counsel for Plaintiffs

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: 3/10/2017